



U.S. Department of Justice

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Southern District of New York*

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New York, New York 10007*

March 9, 2022

By ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *D.J.C.V., et al. v. United States of America*, No. 20-cv-5747 (PAE)

Dear Judge Engelmayer:

The parties provide the below update regarding the above-captioned case. On February 23, 2022, the parties informed the Court that a settlement of this action is not feasible at this time and that the stay in this matter should be lifted. The parties also requested that they be provided until March 9, 2022, to provide a proposed jurisdictional discovery plan to the Court, which the Court granted.

On Friday, March 4, 2022, the parties had a meet and confer with respect to discovery in this matter, at which time the Government made a proposal and raised several issues that would affect the discovery plan. Plaintiffs indicated a desire to internally confer with respect to these issues. Today, Plaintiffs responded to the Government's proposal and sought several pieces of clarification. The parties intend to confer tomorrow about these issues. In light of this need for further conferral and the agency client's need to approve of any final proposal to the Court, the parties respectfully request that they be afforded until March 16, 2022, to submit a proposed plan to the Court.

We thank the Court for its consideration of this matter

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Respectfully,

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/s/ Alexander J. Hogan
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